

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC.

Cross-Claimant,

vs.

BRUCE MAPLEY SR.,

Cross-Claim Defendant.

ARIANE ROWLAND, and JAMIE
SCHULZE,

Plaintiffs,

vs.

WATCHTOWER BIBLE AND
TRACT SOCIETY OF NEW YORK,
INC., WATCH TOWER BIBLE AND
TRACT SOCIETY OF
PENNSYLVANIA, and BRUCE
MAPLEY SR.,

Defendants.

Cause No. CV 20-59-BLG-SPW

**DEFENDANT WATCH TOWER
BIBLE AND TRACT SOCIETY OF
PENNSYLVANIA'S RESPONSES
TO PLAINTIFFS' SECOND SET OF
JURISDICTIONAL DISCOVERY**

TO: Plaintiffs and their counsel, Robert L. Stepan, Ryan R. Shaffer, and James C. Murnion, MEYER SHAFFER & STEPANS PLLP, 430 Ryman Street, Missoula, MT 59802

COMES NOW Defendant Watch Tower Bible and Tract Society of Pennsylvania (hereinafter "WTPA"), by and through its attorneys, and responds to Plaintiffs' Second Set of Jurisdictional Discovery to Defendant WTPA as follows:

GENERAL OBJECTIONS

I. First General Objection: By Providing the Following Answers and Responses, WTPA Does Not Waive its Claim it is Not Subject to Personal Jurisdiction in Montana.

The following Answers and Responses are supplied to Plaintiffs in accordance with: (1) the Court's Orders Providing for Jurisdictional Discovery (Doc. 32 in the *Caekaert* matter¹; Doc. 24 in the *Rowland* matter²); (2) the Joint Jurisdictional Discovery Plan (Doc. 36 in the *Caekaert* matter; Doc. 28 in the *Rowland* matter); (3) the Jurisdictional Discovery Orders issued by the Court (Doc. 42 in the *Caekaert* matter; Doc. 34 in the *Rowland* matter); and (4) the Court's Orders Re Scope of Jurisdictional Discovery (Doc. 47 in the *Caekaert* matter; Doc. 37 in the *Rowland* matter). Nothing herein is intended to waive, explicitly or implicitly, WTPA's claim it is not subject to personal jurisdiction in Montana. *See* Docs. 13, 14, and 25 in the *Caekaert* matter; and Docs. 9, 10, and 18 in the *Rowland* matter (all explaining WTPA's position regarding personal jurisdiction). Should a waiver argument be made, WTPA disputes the same and affirmatively avers any such argument is directly contradictory to WTPA's position on personal jurisdiction. Accordingly, if made, any waiver argument should be wholly rejected.

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¹ References to the *Caekaert* matter means Cause No. CV 20-52-BLG-SPW

² References to the *Rowland* matter means Cause No. CV 20-59-BLG-SPW.

II. Second General Objection: Requests Seeking Information Beyond the Scope of Jurisdictional Discovery are Improper. Any Responses do not Waive WTPA's Claim it is not Subject to Personal Jurisdiction in Montana.

The Court has only allowed jurisdictional, not general, discovery to take place. *See* (Doc. 32 in the *Caekaert* matter; Doc. 24 in the *Rowland* matter). Thus, any discovery requests from Plaintiffs seeking information that goes beyond jurisdictional discovery are improper and are not permitted at this time. Again, as discussed above, any Answers or Responses herein are not intended as a waiver of WTPA's claim it is not subject to personal jurisdiction in Montana. As a corollary, any argument that any Answers or Responses herein answer or respond to matters outside the scope of jurisdictional discovery shall not be deemed an explicit or implicit waiver of WTPA's claim it is not subject to personal jurisdiction, nor shall any Answers or Responses herein be deemed a waiver of the scope of discovery allowed by the Court at this time.

III. Third General Objection: Requests Seeking Information Beyond the Scope of the Court-Ordered Limitations are Improper.

In the Court's Orders Re Scope of Jurisdictional Discovery (Doc. 47 in the *Caekaert* matter; Doc. 37 in the *Rowland* matter), the Court concluded "[d]iscovery regarding WTPA's corporate relationship with WTNY from 1973 to 1992 is...appropriate." *See* Doc. 47 (in the *Caekaert* matter), p. 5; Doc. 37 (in the *Rowland* matter), p. 5. Accordingly, any discovery requests seeking information

before 1973 or after 1992 are improper and outside the scope of Court-ordered limitations on jurisdictional discovery.

INTERROGATORIES

INTERROGATORY NO. 20: Please identify all directors of WTPA from 1970 to 1995, including the dates each individual served as a director.

ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection, WTPA provides the following names of individuals (all of whom are now deceased):

1973	N. H. Knorr	President and Director
	F. W. Franz	Vice President and Director
	G. Suiter	Secretary and Treasurer
	J. O. Groh	Assistant Secretary—Treasurer and Director
	M. G. Henschel	Director
	W. K. Jackson	Director
	L. A. Swingle	Director
1974	N. H. Knorr	President and Director
	F. W. Franz	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	J. O. Groh	Assistant Secretary—Treasurer and Director
	M. G. Henschel	Director
	W. K. Jackson	Director
	L. A. Swingle	Director
1975	N. H. Knorr	President and Director
	F. W. Franz	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	M. G. Henschel	Director

	L. A. Swingle	Director
1976	N. H. Knorr	President and Director
	F. W. Franz	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	M. G. Henschel	Director
	L. A. Swingle	Director
1977	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1978	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1979	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1980	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director

	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1981	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	W. K. Jackson	Assistant Secretary—Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1982	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. E. Barr	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1983	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	G. Suiter	Secretary and Treasurer and Director
	L. A. Swingle	Assistant Secretary—Treasurer and Director
	J. E. Barr	Assistant Secretary—Treasurer and Director
	J. C. Booth	Director
1984	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	L. A. Swingle	Secretary and Treasurer and Director
	J. E. Barr	Assistant Secretary—Treasurer and Director
	J. C. Booth	Assistant Secretary—Treasurer and Director
	T. Jaracz	Assistant Secretary—Treasurer and Director
1985	F. W. Franz	President and Director
	M. G. Henschel	Vice President and Director
	W. L. Barry	Vice President and Director
	L. A. Swingle	Secretary and Treasurer and Director
	J. E. Barr	Assistant Secretary—Treasurer and Director

J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1986 F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1987 F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1988 F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1989 F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1990 F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director

J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1991	
F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director
1992	
F. W. Franz	President and Director
M. G. Henschel	Vice President and Director
W. L. Barry	Vice President and Director
L. A. Swingle	Secretary and Treasurer and Director
J. E. Barr	Assistant Secretary—Treasurer and Director
J. C. Booth	Assistant Secretary—Treasurer and Director
T. Jaracz	Assistant Secretary—Treasurer and Director

INTERROGATORY NO. 21: Please identify all executives of WTPA from 1970 to 1995, including the dates each individual served as an executive and their title(s).

ANSWER: Objection. Please refer to WTPA's Third General Objection, above, for an explanation as to why the time period requested in this Interrogatory is improper. Subject to and without waiving this objection, please see Answer to Interrogatory No. 20.

INTERROGATORY NO. 22: Please identify all general counsels of WTPA from 1970 to 1995, including the dates each individual served as a general counsel.